

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**[PROPOSED] STIPULATED ORDER REGARDING DEPOSITION
DESIGNATIONS AND CORRESPONDING EXHIBITS**

Pursuant to final agreement reached and this Court's directive, this Stipulation is made and entered into by the undersigned parties with reference to the following:

1. Defendants shall provide counter-designations and objections to Plaintiffs' designations for David Hamilton, Gabriel Sterling, Merritt Beaver, and Juan Gilbert no later than Thursday, January 18, 2024, at 6:00pm; and,
2. The parties shall submit a list of Plaintiffs' designations for David Hamilton, Gabriel Sterling, Merritt Beaver, and Juan Gilbert, incorporating Defendants' counter-designations, together with the exhibits Plaintiffs intend to offer into evidence through those designations, before the close of Plaintiffs' case-in-chief; and,

3. The parties and the Court shall consider the designations, counter-designations, and exhibits included in that list as introduced into the trial record by the end of Plaintiffs' case-in-chief; and,
4. Plaintiffs are permitted to physically tender their final set of deposition designations incorporating Defendants' counter-designations and corresponding video files during Defendants' case-in-chief for physical entry into the trial record.

The parties agree that this approach will increase efficiency for the parties and the Court.

IT IS SO ORDERED this ____ day of January, 2024.

U.S. District Court Judge Amy Totenberg

Respectfully submitted this 18th day of January, 2024.

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2024, a copy of the foregoing
**[PROPOSED] STIPULATED ORDER REGARDING DEPOSITION
DESIGNATIONS AND CORRESPONDING EXHIBITS** was electronically
filed with the Clerk of Court using the CM/ECF system, which will automatically
send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross